

Before the
Federal Communications Commission
Washington, D.C. 20554

In the matter of)	WT Docket No. 98-143
1998 Biennial Regulatory Review)	RM-9148
Amendment of part 97 of the)	RM-9150
Commissions Amateur)	RM-9196
Service Rules)	

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INTRODUCTION

I would like to make the following comments regarding the proposed rulemaking that apply to the Amateur Service Rules. The proposal is, in many ways, long overdue considering the changes in technology that have occurred over the past decades. The amateur service was established to lead the way to the development of new technologies yet we have maintained some archaic licensing requirements for operators. The FCC proposal is forward thinking and this review should result in substantive changes that will insure the viability of the amateur service. The following comments refer to the subject areas addressed in the FCC NPRM.

COMMENTS

1. The FCC proposal recommends reducing the Amateur license classes to four levels, I concur with that concept but I would propose that they be reduced even further to the following:

Class A
Class B
Class C

Class A would be the highest grade license and all amateur privileges would be available to this grade of licensee. All current amateur extra and advanced class operators would revert to this class. For new licensees an enhanced written test and code speed of 10 WPM required. All class A licensees would have the highest operating privileges.

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Class B would be the middle level license and convey all current general, technician plus and novice licensees the same privileges as the general class. Code speed requirement 5 WPM and a written examination for new licensees similar to the general class.

Class C would be the beginning license and would be the same privileges as the current technician license. No code required and a test similar to the current technician license.

Note: At the discretion of the FCC the morse code requirement could be dropped in five years based on international requirements.

2. Telegraphy requirements are no longer relevant to any of the radio services but it is understood there will be a lot of current amateurs that feel "I had to do it, so everyone should have to learn it" or that "it will weed out undesirable elements" etc. None of these arguments have merit in the current technological age and a plan should be in place to phase out the Morse code requirements at the earliest possible date. The FCC should not be swayed by any special interest groups to maintain a licensing requirement that is not relevant to current technology. I also feel that the "fill in the blank" examination is sufficient to determine minimum knowledge level.

3. I do favor expanded written examinations and the rationale is that technology such as spread spectrum, satellite and digital etc. have made amateur radio much more diverse and levels of technical knowledge are more important than ever.

4. I concur with the FCC position of eliminating the RACES licenses as they are no longer relevant.

ADDITIONAL COMMENTS.

I understand that the following comments are not requested but it seems to be a most appropriate time for the elimination of many of the sub-bands for the various communications modes for the classes of amateur radio licensees. The current regulations are, in all practicality, unenforceable and there is no problem in countries who do not have such complex regulations. I feel that code, rtty, voice and other modes can coexist and if amateurs in other countries can communicate on a particular mode at a given frequency that is authorized for amateur service there should be no restriction for the U.S. operator. Although this may require a separate study or comment period it would seem that we should take this opportunity to review the unnecessary regulations that restrict full utilization of our valuable spectrum. The following is a suggested class A licensee frequency and emission schedule that is nearly universal in use:

Proposed operating frequencies and emissions for Class A licensee:

1.000 - 2.000 MHz	A1, A3, F1, F3
3.500 - 3.700 MHz	A1, F1
3.700 - 4.000 MHz	A1, A3, A4, A5, F3, F4, F5
7.000 - 7.050 MHz	A1, F1
7.050 - 7.300 MHz	A1, A3, A4, A5, F3, F4, F5
10.000 - 10.150 MHz	A1, F1
14.000 - 14.100 Mhz	A1, F1
14.100 - 14.350 Mhz	A1, A3, A4, A5, F3, F4, F5
18.068 - 18.168 Mhz	A1, A3, A4, A5, F3, F4, F5
21.000 - 21.100 MHz	A1, F1
21.100 - 21.450 MHz	A1, A3, A4, A5, F1, F3, F4, F5
24.890 - 24.990 Mhz	A1, A3, A4, A5, F1, F3, F4, F5
28.000 - 28.100 Mhz	A1, F1
28.100 - 29.700 Mhz	A1, A3, A4, A5, F1, F3, F4, F5
50.000 - 54.000 Mhz	A0, A1, A2, A3, F1, F2, F3, F4
144.000 - 148.000 Mhz	A0, A1, A2, A3, A4, F1, F2, F3, F4
(Above 148.000 Mhz use current sub-bands)	

Notes:

1. Class B licensee could be limited to current General Class sub-bands.
2. Class C licensee would be limited to current Technician frequencies.

CONCLUSION

In summary I concur with the proposal of this NPRM ,however, I also feel that the regulations can be further simplified. The classes of amateur licenses could be reduced to less than four, and the morse code requirements should be in the process of being phased out as it is not an indication of technical knowledge or operating skill.

Respectfully submitted:

Robert S. Ross, October 1, 1998

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